

REMARKS

The Examiner has objected to Claim 13 due to informalities. Applicant respectfully asserts that such objection has been avoided in view of the clarification made to the claim.

The Examiner has rejected Claims 1, 2, 4-14, 16-26 and 28-42 under 35 U.S.C. 102(e) as being anticipated by Annicchiarico et al. (U.S. Patent No. 6,247,148). Applicant respectfully disagrees with such rejection, especially in view of the amendments made hereinabove.

With respect to independent Claims 1, 13 and 25, the Examiner has relied on Col. 4, lines 20-52 in Annicchiarico to make a prior art showing of applicant's claimed "masking the portion of outgoing network data to impersonate a different operating system in accordance with a security policy if the network is an untrusted network" (see the same or similar, but not necessarily identical language in each of the foregoing claims).

Applicant respectfully asserts that such excerpt merely relates to "means for mimicking the architecture of another operating system so that they call extension subroutines for processing input (and/or output) instead of its own, while at the same time providing a means for returning the operating system to its normal state after the use of the extension is completed." Thus, Annicchiarico only discloses calling subroutines from a different operating system with respect to input and output devices (e.g. keyboard and mouse-see excerpt relied on by the Examiner). Applicant notes that simply nowhere in Annicchiarico is there any disclosure of "a security policy," let alone "masking the portion of outgoing network data to impersonate a different operating system in accordance with [the] security policy if the network is an untrusted network," as specifically claimed by applicant (emphasis added).

With respect to each of the independent claims, the Examiner has failed to even address applicant's claimed "prevent[ing] identification of the operating system by impersonating the different operating system, for misleading attackers into attempting attacks that are unworkable on the operating system." Applicant respectfully asserts that Annicchiarico does not meet such specific claim language since Annicchiarico only relates to "mimicking the architecture of another operating system...[to] call extension subroutines for processing input (and/or output) instead of its own" (Col. 4, lines 20-52-*emphasis added*).

Simply nowhere does Annicchiarico even suggest "prevent[ing] identification of the operating system... for misleading attackers into attempting attacks that are unworkable on the operating system," as specifically claimed by applicant (*emphasis added*). Instead, Annicchiarico teaches intercepting keyboard and mouse input and utilizing subroutines of another operating system to process such input (Col. 4, lines 31-42). Clearly, such teaching does not even suggest any sort of "outgoing network data," etc., as claimed by applicant.

Applicant further emphasizes the amendments made hereinabove to independent Claims 1, 13 and 25 as follows:

"conditionally masking the portion of outgoing network data to impersonate a different operating system in accordance with a security policy if the network is an untrusted network" (see the same or similar, but not necessarily identical language in each of the foregoing claims).

Applicant respectfully asserts that nowhere in Annicchiarico is there any disclosure of "conditionally masking...outgoing network data," in the manner claimed by applicant.

The Examiner is reminded that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a

single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, the identical invention must be shown in as complete detail as contained in the claim. *Richardson v. Suzuki Motor Co.* 868 F.2d 1226, 1236, 9USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

This criterion has simply not been met by the Annicchiarico reference, especially in view of the amendments made hereinabove. A notice of allowance or a specific prior art showing of each of the foregoing claimed features, in combination with the remaining claimed features, is respectfully requested.

Applicant further notes that the prior art is also deficient with respect to the dependent claims. Just by way of example, with respect to Claim 2 et al., the Examiner has relied on Col. 4, line 53-Col. 5, line 8 in Annicchiarico to make a prior art showing of applicant's claimed technique "wherein masking the portion comprises: discarding the portion of outgoing network data." Applicant respectfully asserts that such excerpt only discloses "swapping the address of the XTrap extension output handling routine with the address of the X server output handling routine." Clearly, swapping addresses such that different routines are called does not even suggest "discarding the portion of outgoing network data," as claimed by applicant (emphasis added).

With respect to Claim 4 et al., the Examiner has relied on Col. 4, lines 20-52 in Annicchiarico to make a prior art showing of applicant's claimed technique "wherein the security policy identifies the portion of outgoing network data and specifies an action to take to mask the portion of outgoing network data." Applicant respectfully asserts that simply nowhere in such excerpt, nor in the entire Annicchiarico reference, is there any disclosure of a security policy, let alone a "security policy [that] identifies the portion of outgoing network data and specifies an action to take to mask the portion of outgoing network data," as claimed by applicant (emphasis added). Applicant notes that Annicchiarico only generally teaches "mimicking the architecture...[to] call extension subroutines...instead of its own," but not specifically utilizing a security policy, and

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especially not to identify outgoing network data and specify an action to take, in the manner claimed by applicant.

With respect to Claim 6 et al., the Examiner has relied on Col. 3, lines 40-46 in Annicchiarico to make a prior art showing of applicant's claimed technique "wherein the security policy further defines the network as untrusted." Applicant respectfully asserts that such excerpt merely discloses "intercept[ing] the input, reformat[ing] a copy of the input...and send[ing] the original input to the server." Simply nowhere in the excerpt relied on by the Examiner is there even a suggestion of "defin[ing] the network as untrusted," as claimed by applicant (emphasis added).

With respect to Claim 9 et al., the Examiner has relied on Col. 5, lines 29-48 in Annicchiarico to make a prior art showing of applicant's claimed "transmitting the portion of outgoing network data unchanged if the network is a trusted network." Applicant notes that such excerpt only relates to a bit fields, but not to any sort of trusted network, and especially not to transmitting any sort of network data unchanged "if the network is a trusted network," as specifically claimed by applicant.

Applicant again respectfully asserts that the Annicchiarico reference fails to meet all of applicant's claim limitations, for the reasons noted hereinabove. A notice of allowance or a specific prior art showing of each of the foregoing claimed features, in combination with the remaining claimed features, is respectfully requested.

Thus, all of the independent claims are deemed allowable. Moreover, the remaining dependent claims are further deemed allowable, in view of their dependence on such independent claims.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. The

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Commissioner is authorized to charge any additional fees or credit any overpayment to
Deposit Account No. 50-1351 (Order No. NAI1P350/01.022.01).

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